United States Environmental Protection Agency, Region III
Corrective Action Program

FINAL RCRA SITE VISIT REPORT

Precision Products Group, Inc. – Stone Industrial Division
EPA ID No. MDD 058 594 920
9207 51st Avenue
College Park, MD 20740

Prepared for:

United States Environmental
Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-4431

Maryland Department of the
Environment
1800 Washington Boulevard
Baltimore, MD 21230

MDE

Prepared by:

Tetra Tech EC, Inc.
Bucks Town Corporate Campus
820 Town Center Drive, Suite 100
Langhorne, PA 19047

August 11, 2010

TETRA TECH EC, INC.

August 11, 2010

Denis Zielinski
United States Environmental Protection Agency
Region III
1650 Arch Street
Mail Code 3LC20
Philadelphia, PA 19103-2029

SUBJECT: FINAL RCRA CORRECTIVE ACTION SITE VISIT REPORT
USACE CONTRACT NO. W912DQ-08-D-0019
TASK ORDER NO. 005A

Please find enclosed one paper copy and one electronic copy on CD Rom of the Final RCRA Site Visit Report for the following facility:

Precision Products Group, Inc. – Stone Industrial Division
EPA ID No. MDD 058 594 920
9207 51st Avenue
College Park, MD 20740

Please contact me at (215) 702-4003 with any questions or concerns.

Sincerely,

Roxanne Clarke

Roxanne Clarke
TtEC Project Manager

Enclosures
cc: Mr. Ed Hammerberg (MDE)
Mr. Joe DiSilvio, Stone Industrial

Bucks Town Corporate Campus, 820 Town Center Drive, Suite 100, Langhorne, PA 19047-1748
Tel 215.702.4000 Fax 215.702.4045
www.tteci.com

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August 11, 2010

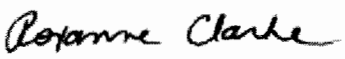
This RCRA SITE VISIT REPORT (FINAL) has been prepared by:

8/11/10

Brad Baillargeon
Mechanical Engineer
Tetra Tech EC, Inc.

Date

The report was approved by:



8/11/10

Roxanne Clarke
Environmental Engineer
Tetra Tech EC, Inc.

Date

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RCRA SITE VISIT REPORT

Precision Products Group, Inc. – Stone Industrial Division
EPA ID# MDD 058 594 920
9207 51st Avenue
College Park, MD 20740

1.0 PURPOSE

The purpose of this RCRA Site Visit Report is to consolidate relevant information for Precision Products Group, Inc. – Stone Industrial Division (Stone Industrial) facility site associated with United States Environmental Protection Agency (USEPA) ID Number MDD 058 594 920. This information will be used to augment the existing facility information.

2.0 DOCUMENTATION REVIEW

Mr. Jonathan Dziekan and Mr. Brad Baillargeon of Tetra Tech EC, Inc. (TtEC) reviewed documents at the Maryland Department of the Environment (MDE) Office in Baltimore, Maryland on February 22, 23, and 24, and March 16, 17, and 18, 2010. A similar file review was conducted by Mr. Jonathan Dziekan and Mr. Brad Baillargeon at the USEPA Region III, Philadelphia Office on January 27 and 28, 2010. The purpose of these reviews was to identify known Areas of Concern (AOCs) and Solid Waste Management Units (SWMUs) at the Stone Industrial facility prior to conducting a site visit.

3.0 SITE VISIT

An on site meeting and a site visit were conducted on June 22, 2010 to discuss the Stone Industrial facility located at 9207 51st Avenue in College Park, Maryland. A list of attendees at that site visit is as follows:

Name	Company/Agency	Telephone Number	E-mail Address
Roxanne Clarke	TtEC	215-702-4003	Roxanne.Clarke@tetratech.com
Brad Baillargeon	TtEC	215-702-4130	Brad.Baillargeon@tetratech.com
Denis Zielinski	USEPA	215-814-3431	Zielinski.Denis@epa.gov
Michael Matthews	Stone Industrial	301-474-3100 x 280	mmatthews@ppgintl.com
Shaun Bell	Stone Industrial	260-446-7944	sbell@ppgintl.com
Edward Hammerberg	MDE	410-537-3356	Ehammerberg@mde.state.md.us

4.0 MEETING SUMMARY

The meeting began at 10:00AM EST on June 22, 2010 at the Stone Industrial facility. Mr. Denis Zielinski, USEPA Region III RCRA Project Manager, opened the meeting by reviewing the purpose and anticipated outcomes of the visit and the Resource Conservation and Recovery Act (RCRA) Corrective Action Program. Mr. Zielinski presented the facility with information

regarding USEPA Region III's Corrective Action process, the Environmental Indicator Assessment Program, 20/20 Vision, the Facility Lead Program, and the policy driving this program.

Under this investigation, USEPA Region III is focusing on two interim Environmental Indicators to evaluate whether any unacceptable risk to human health and the environment is ongoing at the facility. The two indicators are determining if human exposures are controlled and if groundwater releases are controlled.

The Facility Lead Program, as described by Mr. Zielinski, allows facilities under RCRA Corrective Action to proactively implement measures that resolve Corrective Action Items without a Corrective Action Order or Permit. The Facility Lead Program eliminates administrative burdens and expedites the resolution of Corrective Action Items.

Mr. Shaun Bell of Stone Industrial provided a brief description of facility activities and corrective actions, and then led a tour of the facility during which he answered questions regarding specific facility features. Photographs of the AOCs and SWMUs identified at the facility during the site visit were taken by TtEC and are included as Appendix A of this report.

5.0 LOCATION, SUMMARY OF OPERATIONAL AND MANAGEMENT HISTORY, AND DESCRIPTION OF WASTES GENERATED AT THE FACILITY

The Stone Industrial facility is located at 9207 51st Avenue in College Park, Prince Georges County, Maryland. The site is located in a commercial/residential area. The site is bordered to the northeast by the College Park Public Works, to the southeast by an auto body repair shop (Maaco), to the east by residential homes, and to the west by 51st Avenue (residential homes beyond 51st Avenue). B&O Railroad tracks run along the eastern border of the site. Figure 1 depicts the location of the site, while Figure 2 provides the site layout.

The facility consists of three buildings enclosed in a fenced compound on a 17-acre lot. One building is designated as office space and two of the buildings are designated as plant buildings (Paper Winding Building and Plastic Winding Building).

The site has manufactured custom spiral-wound products and tubing since 1950. The site was first purchased by Landrum Platt (owned Stone Industrial) in the 1930s as undeveloped land. The spiral wound tubing facility of Platt Corporation, was moved from Washington, D.C. to this location in College Park in 1950. In 1972, J.L. Clark Manufacturing Inc. purchased the site. On February 2, 1988, the facility notified the MDE its name was changing from J.L. Clark Manufacturing Company to CLARCOR. The site was still to be referred to as Stone Industrial, a member of the CLARCOR Precision Products Group. The facility manufactured paper and plastic tubes in the 1990s and currently manufactures plastic tubing for the household motor industry (motors for air conditions, refrigerators, etc.).

According to the Department of Public Works, the site and surrounding area are served by county/city water.

USEPA Region III acknowledged receipt of J.L. Clark Manufacturing Company's Part A Hazardous Waste Permit Application on July 14, 1981. A letter from the Department of Health and Mental Hygiene dated September 26, 1983 informed J.L. Clark Manufacturing that the agency was in receipt of the facility's Permit Application withdrawal request. In a letter dated January 10, 1984, USEPA Region III notified the J.L. Clark Manufacturing Company/Stone Industrial that it would now be permitted by the State of Maryland based on information submitted.

The facility currently operates under MDE State Operating Permit No. 033-0429 (set to expire May 31, 2014) for the following equipment:

- Two small natural gas boilers
- Twelve mylar winders that produce spiral wound plastic tubing
- Two small solvent recovery units
- One Reeco® regenerative thermal oxidizer that controls Volatile Organic Compound (VOC) emissions from the mylar winding and solvent recovery operations

5.1 Area Geology and Hydrogeology

Geology

According to the 1989 Environmental Assessment Report, the site is located in the Coastal Plain Physiographic Province, just east of the Fall Line. The area is characterized by rolling hills with topographic reliefs of approximately 100 feet to the west due to less easily eroded intrusive rocks. To the east, the topographic relief is approximately 50 feet because of less resistant coastal plain sediments. The occurrence of the Laurel Migmatite marks the Fall Line between the Coastal Plain Province and the Piedmont Province to the west.

The site lies geologically on the Wicomico Formation. Among the lithologies observed in the area include the Quaternary-age Pamlico Formation, the Quaternary-age Wicomico Formation, the Cretaceous-age Patapsco Formation, the Cretaceous-age Patuxent Formation, and Laurel Migmatite.

The Pamlico Formation is described as gravel, sand, and silt from stream deposits and alluvium. The Wicomico Formation is characterized by gravel, sand, and silt deposited in upland streams. The Patapsco Formation is characterized in this area by dark gray, massive clay containing lignitized wood that is overlain by varicolored sand and clay. The entire Formation is approximately 300 feet thick. Underlying this is the Patuxent Formation, which is described as interbedded fine, white, pink, or yellow sand and white or iron-stained clay. The Formation has an estimated thickness of 100 feet. The Laurel Migmatite is intensely granitized schist mixed with impure granite.

The site lies on the Sunnyside-Urban Land complex and exhibits less than a 3% slope. It consists of deep, well-drained soils that developed in fine sandy sediments which contain reddish clay. The following soil associations are located within a 3-mile radius of the site:

- Manor-Glenleg Association - deep, well drained, and somewhat excessively drained, nearly level to very steep soils of Piedmont Province.
- Beltsville-Leonardtown-Chillium Association - Moderately deep, well drained to poorly drained, dominantly gently sloping soils, which have compact subsoil.
- Christiana-Sunnyside-Beltsville Association - deep, level to steep, well drained, sandy and clayey soils which have compact subsoil.
- Bibb-Tidal Marsh Association - poorly drained soils of the flood plains and soils in marches subject to tidal flooding.

No site-specific soil information was found in the files reviewed.

Hydrogeology

The most used aquifer in the vicinity of the site is the Patuxent Formation. Several fractures trace along the contact with sedimentary rocks and the underlying members, which allow for rapid transmission of water. According to the 1989 Environmental Assessment Report, wells in this formation yield from 100 to 200 gallons per minute. Surface water runoff within a 3-mile radius of the site has the opportunity to percolate into the Wicomico Formation. Water that does not percolate into this formation will enter the Indian Creek (1,000 feet east of the site), which flows into the Anacostia River.

No monitoring wells have been installed at the site; no site-specific groundwater information was found in files reviewed.

According to the Department of Public Works, the site and surrounding area are served by county/city water.

5.2 Wastes Generated at the Facility

The facility is a Large Quantity Generator (LQG). Hazardous waste generated during the manufacturing process includes:

- Mixed solvents
- Drum/Pail liners
- Absorbent materials
- Solid still bottoms

Hazardous wastes are shipped to Rineco in Benton, Arkansas for disposal within the 90-day holding time.

6.0 DESCRIPTION OF AOCs AND SWMUs

Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs)

6.1 SWMU No. 1 - Former Flammable Spent Solvents Satellite Storage

The adhesive used to bind plastic wound tubing was temporarily stored adjacent to the winding machines in the Plastic Winding Building. The adhesive was recycled at the rear of the building where solvents were recovered through a 2-day distillation process. Drums were historically staged on the concrete floor of this area. Evidence of minor spills and over fills (interior of the building) was noted in the October 1989 Environmental Priorities Initiative - Preliminary Assessment Report. Photograph No. 1 shows this unit.

No evidence of any other spills or releases was found during the site visit or in the files reviewed at the MDE or USEPA Region III offices. Site representatives are unaware of any additional spills or releases from this unit, and had no information regarding any spills or releases in their files.

6.2 SWMU No. 2 - Current Satellite Storage Area

The Current Satellite Storage Area is located in the Chemical Room of the Plastic Winding Building. This area is used to store a variety of chemicals including pressure sensitive adhesive, polyester adhesive, isopropyl alcohol, toluene, and acetone. This unit has a concrete floor. Photograph No. 2 depicts this unit.

Filled drums of ignitable still bottom and waste polyester resin bag liners are stored in metal racks.

No evidence of a spill or release was found during the site visit or in the files reviewed at the MDE or USEPA Region III offices. Site representatives are unaware of any spills or releases from this unit, and had no information regarding any spills or releases in their files.

6.3 SWMU No. 3 - Former Recovered Solvents Distiller

The facility utilized a distiller to recover solvents from the spent solvent adhesive used to bind the plastic wound tubing. This still was a model 380 unit and was much larger than the two current distillers (SWMU No. 4) were. The distiller was located in the rear of the Plastic Winding Building. The still bottoms from this process were considered to be hazardous waste. The still bottom was collected in drums at the site of the distiller before being transferred to the SWMU No. 1. This unit was confined by a berm to contain any spilled solvents or still bottom. Photograph No. 3 shows the former location of this unit.

No evidence of a spill or release was found during the site visit or in the files reviewed at the MDE or USEPA Region III offices. Site representatives are unaware of any spills or releases from this unit, and had no information regarding any spills or releases in their files.

6.4 SWMU No. 4 - Current Recovered Solvent Distillers

The facility currently operates two solvent distillers to recover solvents from the spent solvent adhesive used to bind the plastic wound tubing. The units have been in use since approximately 1992 and are 55-gallons in size. These units are shown in Photograph No. 4.

No evidence of a spill or release was found during the site visit or in the files reviewed at the MDE or USEPA Region III offices. Site representatives are unaware of any spills or releases from this unit, and had no information regarding any spills or releases in their files.

6.5 SWMU No. 5 - Current Wastewater Aboveground Storage Tank

A 6,000-gallon self-contained Aboveground Storage Tank (AST) is used to store wastewater generated by the former wet grinding portion of the phenolic paper impregnation process. The high pH non-hazardous wastewater is removed from the tank twice per year by DuPont for offsite treatment and disposal. This tank replaced a wastewater UST (located near the former MEK UST location) in 1989. Lye used to clean equipment was also directed to the UST. This unit is shown in Photograph No. 5.

No evidence of a spill or release was found during the site visit or in the files reviewed at the MDE or USEPA Region III offices. Site representatives are unaware of any spills or releases from this unit, and had no information regarding any spills or releases in their files.

6.6 SWMU No. 6 - Trash Compactor

One trash compactor is in use near the main entrance of building (middle of western side of building). The trash compactor is located near a blind sump; liquid from this sump is transferred to SWMU No. 5. An area beneath the portion of the trash compactor closest to the building was observed to be stained with oil during the June 22, 2010 Site Visit. Photograph Nos. 6 and 7 show this unit.

No evidence of any other spills or releases was found during the site visit or in the files reviewed at the MDE or USEPA Region III offices. Site representatives are unaware of any additional spills or releases from this unit, and had no information regarding any spills or releases in their files.

6.7 SWMU No. 7 - Trash Dumpsters

Two trash dumpsters were observed on the southern side of the site during the June 22, 2010 Site Visit. They were found to contain general trash and landscaping debris (branches, tree limbs, etc)as shown on Photograph No. 8. Site representatives indicated that typically one dumpster is used onsite.

No evidence of a spill or release was found during the site visit or in the files reviewed at the MDE or USEPA Region III offices. Site representatives are unaware of any spills or releases from this unit, and had no information regarding any spills or releases in their files.

6.8 AOC No. 1 - Methyl Ethyl Ketone UST Release

On August 22, 1989, an MEK UST system was overfilled, resulting in the release of approximately 450 gallons of product. This tank system was comprised of two USTs; Tank Nos. 2 and 3, which were each 750 gallons in capacity and connected by piping (the facility referred to this as one UST when discussing the release). This tank was located near the northwestern corner of the Paper Winding Building as shown on Photograph No. 9. According to an October 9, 1989 from the facility to the MDE, the release was reported to the National Response Center (NRC) within an hour of being identified.

The spill migrated approximately 10 feet towards the adjoining College Park Public Works property. The MEK flowed 290 feet northeast across the Public Works property turning south on to the CSX Transportation property, flowing an additional 15 to 20 feet. The spill was contained and cleaned up under the oversight of a Public Health Engineer from the Maryland Hazardous and Solid Waste Management Administration section of the MDE.

On August 23, 1989, EA Engineering, Science, and Technologies (EA) collected twelve soil samples along the path of the spill. Soil sample results ranged from trace amounts (at furthest point from the spill site) of MEK to 12,000 parts per million (ppm) (at the spill site). On September 1, 1989, a representative of the MDE's Underground Storage Tank (UST) Division inspected the site (the project was transferred from MDE's Hazardous and Solid Waste Management Enforcement Division to the UST Division). This representative explained that all area except along the railroad fence line could be backfilled (the excavation that took place before this inspection was not described in this document). The area along the fence line between the Public Works property and the CSX railroad required further excavation.

Further excavation was conducted on September 27, 1989 once access to CSX property was obtained in the presence of the UST Division representative. During the excavation activities, EA collected volatile readings with a hand held meter; the soil was excavated to a depth when these readings became acceptable to the UST Division representative (0 to 2 parts per billion (ppb)). A total of 157 metal 55-gallon drums of soil had been removed from the excavation. The drums were shipped to ChemWaste Management, Inc. in Emelle, Alabama.

Prior to the UST Division representative's departure from the site, he required the following activities:

- Return all disturbed areas to the original and acceptable condition of the owners (completed)
- Submit copies of soil sample results (completed)
- Submit copies of hazardous waste manifests upon disposal (completed)

The MEK UST was removed on September 21, 1989. A Prince George's County Permit issued by the Fire Inspector dated September 22, 1989 indicated these tanks had been removed. No

holes were observed in the tanks and no soil contamination was found. A soil sample was collected from the tank excavation and analyzed for isopropanol and MEK; neither compound was detected.

6.9 AOC No. 2 - Location of 1980s Fire

In the late 1980s, a fire occurred when hot wax tubes and cardboard combusted inside the building. The sprinkler system activated and the Fire Department responded. Water generated during this event was directed to the former wastewater UST via sumps. The vicinity of this area is shown in Photograph No. 10.

6.10 AOC No. 3 - Underground Storage Tanks

The site historically maintained eleven USTs according to a figure in the 1989 Environmental Assessment Report (site representatives provided an updated figure which depicted additional removal information) as summarized below.

Stone sent a letter to the MDE on March 22, 1993 informing the Compliance/Remediation Division that six USTs had been removed from the site in 1989. The letter indicated Stone had not received confirmation from MDE verifying the removal of the tanks and the closing of this project. A letter from MDE to Stone on May 2, 1997 reported MDE records showed 5 USTs had been removed on or about September 21, 1989 and that no USTs exist at the site. Neither of these letters identified the tanks referenced.

Tank No. 1

This 3,000-gallon wastewater UST was installed in 1953 and removed on April 30, 1996 (1989 Environmental Assessment Report indicated a removal date of August 30, 1995). According to an MDE Report Observations dated April 30, 1996, MDE visited the site to verify completion of remediation activities. This Report indicated the tank (and associated piping) had been removed in September 1995 and the excavated area was backfilled. Soil sample analysis (samples was identified as Pit Bottom) indicated no MEK or other VOCs in concentrations greater than detection limits. The work area needed to be graded and re-vegetated. New sumps were observed, which would drain to the 6,000-gallon wastewater AST located adjacent to the building (SWMU No. 5). The MDE representative noted the activities observed complete the requirements previously set for this area. No documented releases were found in files reviewed.

Tank Nos. 2 and 3

See discussion of AOC No. 1 above.

Tank Nos. 4, 5 6, and 11

Tank Nos. 4, 5, and 6 were 1,500-gallon isopropyl alcohol USTs installed in 1970 and removed on September 21, 1989. According to the 1989 Environmental Assessment Report, Tank No. 4 was described as leaking during an April 18, 1986 test. Facility representatives indicated that all

piping was disconnected and use of the tank ceased. A Prince George's County Permit issued by the Fire Inspector dated September 22, 1989 indicated these tanks had been removed. No holes were observed in the tanks and no soil contamination was found. A soil sample was collected from the tank excavation and analyzed for isopropanol and MEK; neither compound was detected.

Tank No. 11 was 1,500-gallon MEK UST installed in 1970 and removed on September 21, 1989. This tank was included in the Prince George's County Permit issued by the Fire Inspector dated September 22, 1989. No holes were observed in the tanks and no soil contamination was found. A soil sample was collected from the tank excavation and analyzed for isopropanol and MEK; neither compound was detected.

Tank Nos. 7 and 8

Tank No. 7 was a 10,000-gallon No. 2 oil UST installed in 1975 and removed on September 22, 1989. Tank No. 8 was an 8,000-gallon non-hazardous wastewater tank installed in 1982 and removed on September 22, 1989. Removal services for both tanks appear on an invoice dated October 10, 1992 from Tri County Industries. Tank No. 8 was replaced with SWMU No. 5. No information regarding tank excavation sampling or tank conditions was found in files reviewed.

Tank No. 9

Tank No. 9 was a 10,000-gallon No. 2 oil tank installed in 1974 and removed on June 1, 1985. According to facility representatives, this tank was partially buried in the ground (half of this tank was aboveground, while the other half was below). According to the 1989 Environmental Assessment Report, this tank passed a tightness test on June 1, 1985. No information relating to the tank's condition upon removal or releases was found in files reviewed.

Tank No. 10

Tank No. 10 was a 4,000-gallon No. 2 oil UST installed in 1954 and removed between July 28 and 29, 1988 when the boiler was converted to natural gas. According to a Purchase Order issued by J.L Clark Manufacturing to Stone and Hoover Contracting on July 21, 1988, this tank and piping were to be removed in the presence of the Prince George's County Fire Marshal, the excavation backfilled, and asphalt paving restored. Facility representatives reported this tank was removed in accordance with the Purchase Order. According to the 1989 Environmental Assessment Report, this tank passed a tightness test on February 10, 1988. No information relating to the tank's condition upon removal or releases was found in files reviewed.

7.0 DESCRIPTION OF EXPOSURE PATHWAYS FOR ALL RELEASES OR POTENTIAL RELEASES

One documented release of MEK occurred when a UST was overfilled in August 1989. The material was contained and contaminated soil was subsequently removed under oversight of the MDE.

7.1 Air

The site is bordered by residential areas to the east and west (across 51st Avenue). No complaints or permit exceedances were found in the files reviewed.

7.2 Surface Water

The nearest surface water body (Indian Creek) is located approximately 1,000 feet east of the site. This surface water is part of the Indian Branch which flows south and enters the Anacostia River which empties into the Potomac River. There are no outfalls or discharges to the creek.

7.3 Groundwater

Groundwater flow and quality are no known as no monitoring wells have been installed at the Stone site. All hazardous wastes are stored and managed indoors. The site contains both paved (parking areas) and grassed areas (around buildings).

7.4 Soil

Soil removal activities took place in response to the 1989 MEK UST overfill release under MDE supervision. No evidence of other releases was found in files reviewed. All areas that contain hazardous waste are located indoors.

8.0 EXPOSURE PATHWAY CONTROLS AND RELEASE CONTROLS INSTITUTED AT THE FACILITY

8.1 Site Access

A fence surrounds the entire Stone Industrial facility, with a gate to control access after working hours.

8.2 Air

The facility currently operates under MDE State Operating Permit No. 033-0429 (set to expire May 31, 2014) for two small natural gas boilers, twelve mylar winders, two small solvent recovery units, and one thermal oxidizer that controls VOC emissions from the mylar winding and solvent recovery operations.

8.3 Surface Water

There are no outfalls or discharges on site.

8.4 Groundwater

Groundwater quality at the site is unknown. According to the Department of Public Works, the site and surrounding area are served by county/city water.

8.5 Soil

All hazardous wastes are stored and managed indoors. The site contains both paved (parking areas) and grassed areas (around buildings).

9.0 FOLLOW-UP ACTION ITEMS

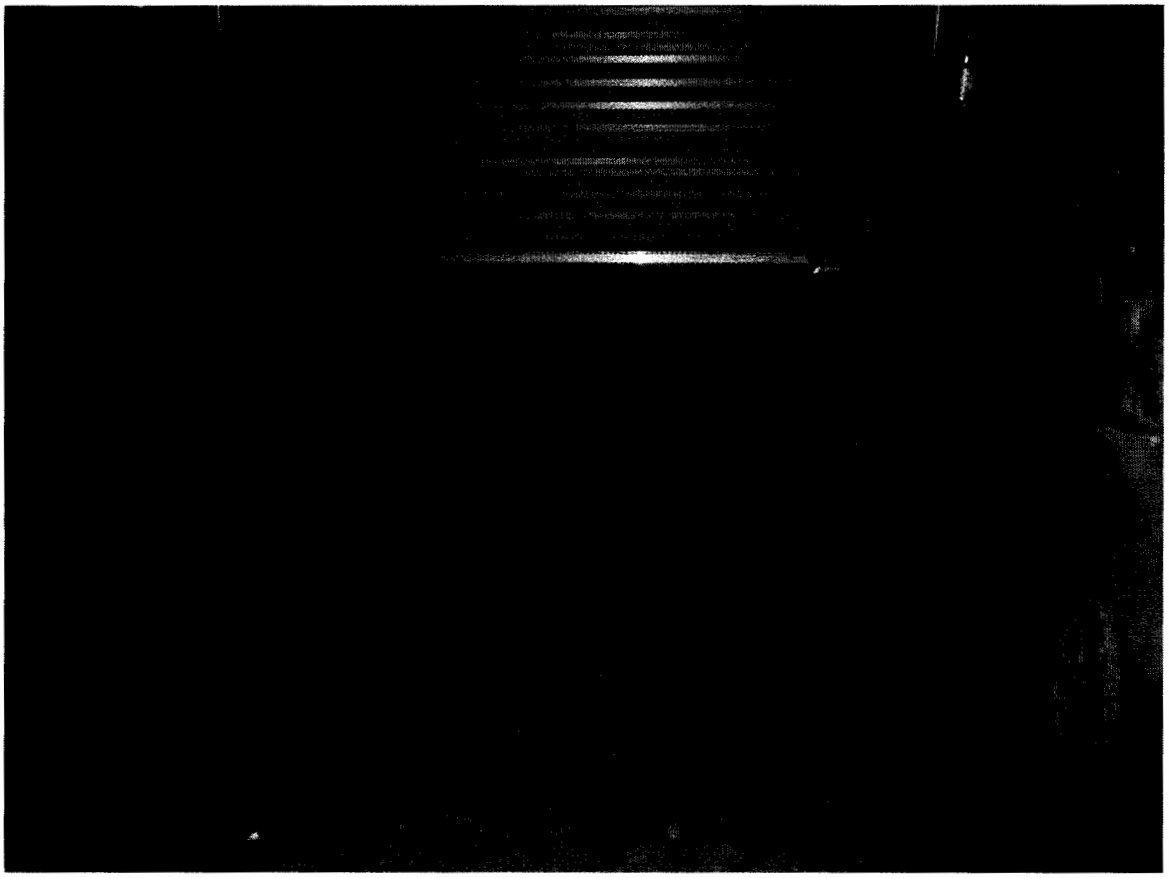
The USEPA Region III and the MDE will decide if additional information or sampling at the facility is required to determine whether the environmental indicators have been met or if corrective action is required at the facility.

APPENDIX A

SITE VISIT PHOTOGRAPHS

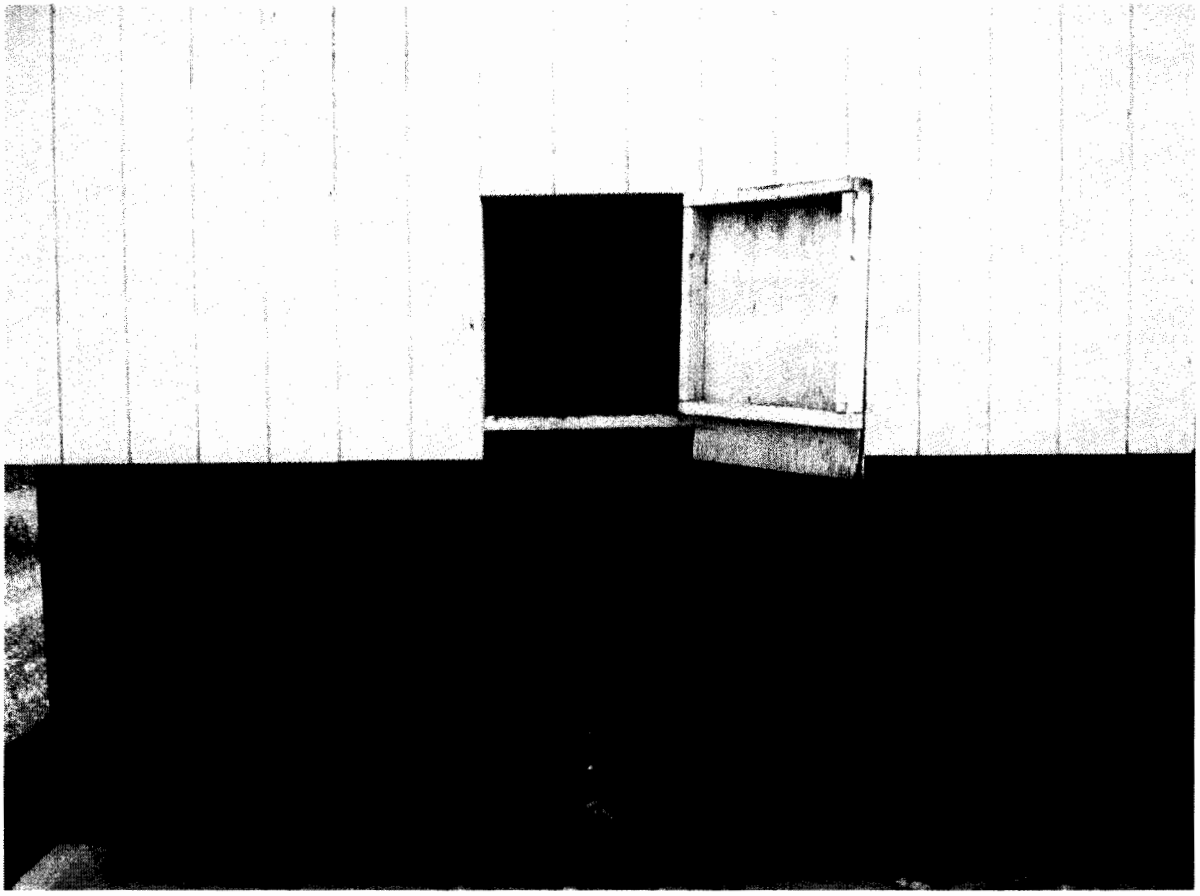
View of SWMU No. 1 – Former Flammable Spent Solvents Satellite Storage in the Plastic Winding Area of Building 2

View of SWMU No. 2 – Current Satellite Storage Area located along the Interior Northern Wall of Building 2



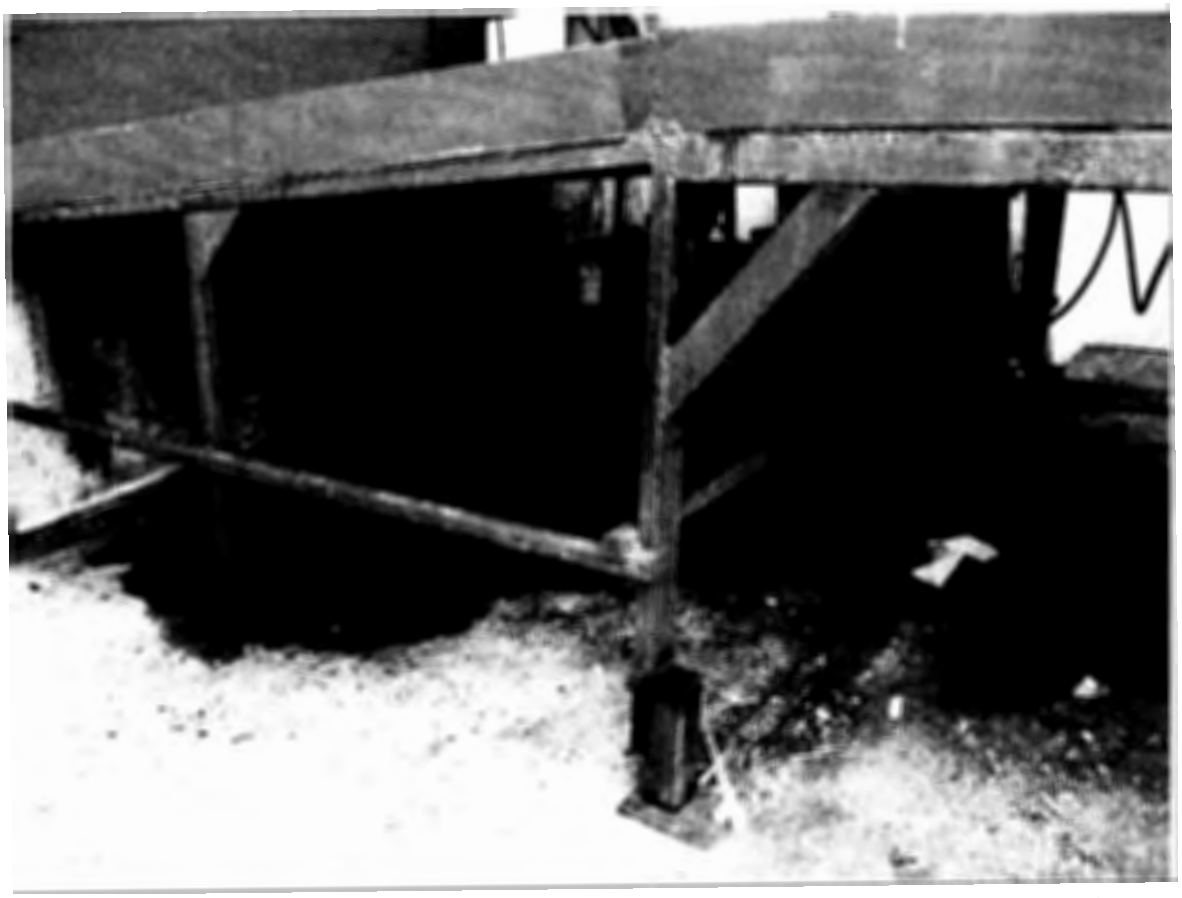
View of SWMU No. 3 – Former Recovered Solvent Distiller in the Plastic Winding Area of Building 2

View of SWMU No. 4 – Current Recovered Solvent Distiller Along Interior Northern Wall of Building 2



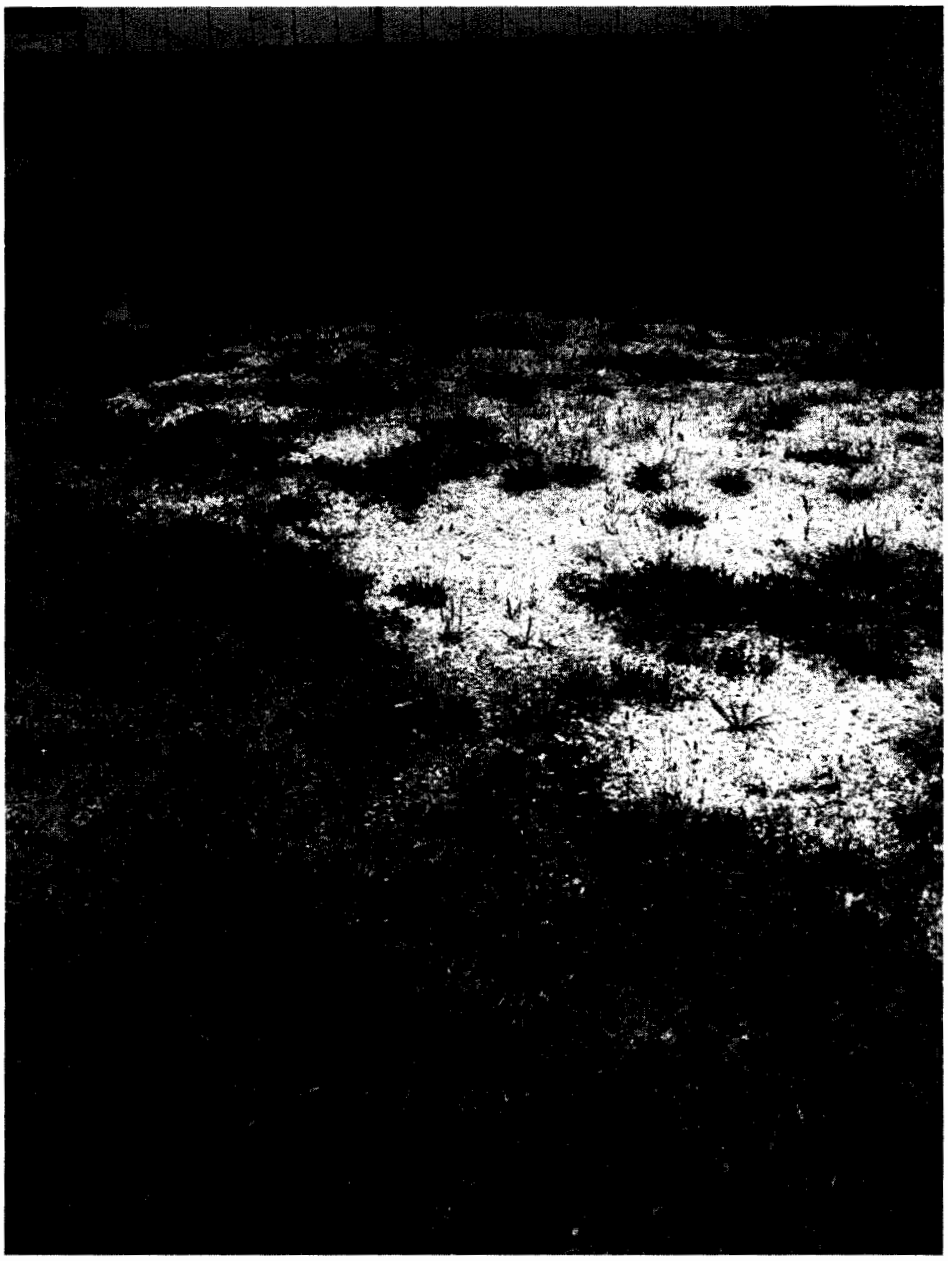
View of SWMU No. 5 – Wastewater Aboveground Storage Tank at Northern Exterior of Building 2

View of SWMU No. 6 – Trash Compactor at Entrance to Building 2

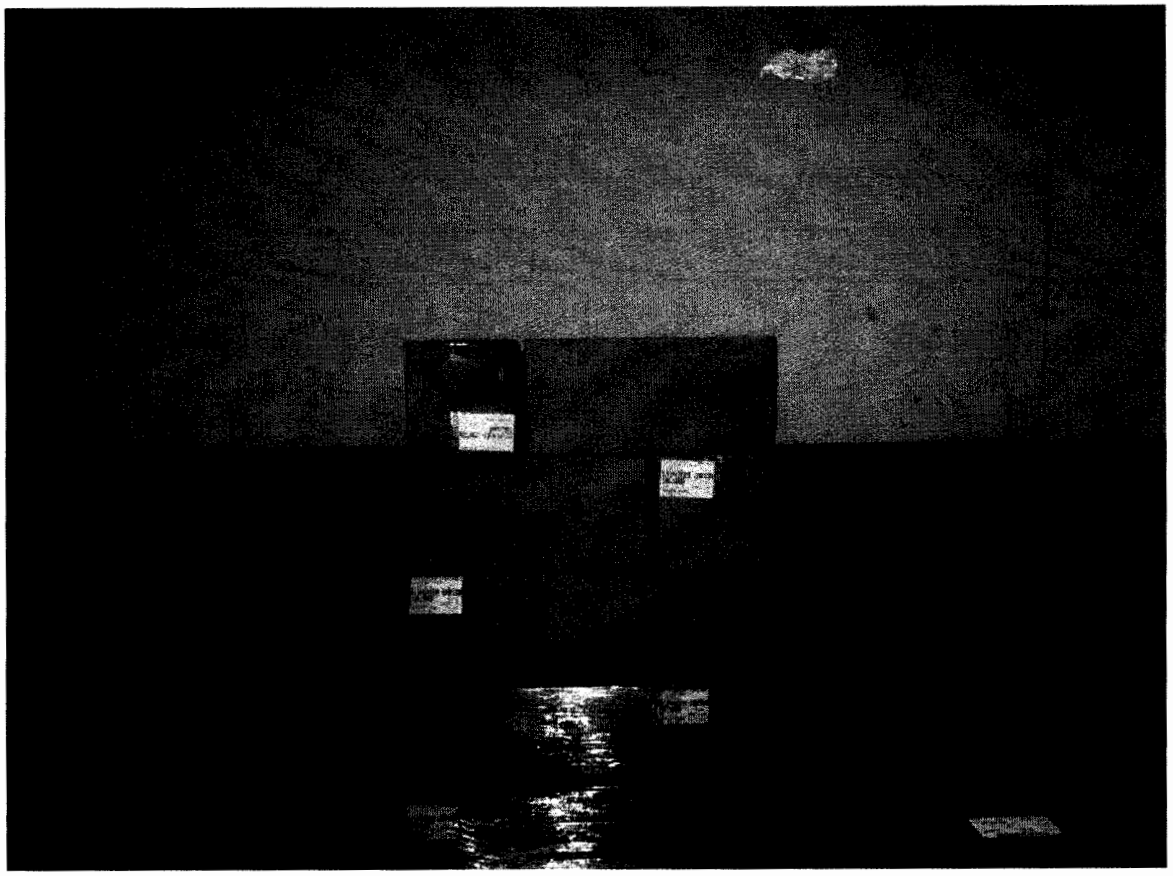


View of Staining Beneath SWMU No. 6 – Trash Compactor at Entrance to Building 2

View of SWMU No. 7 – Trash Dumpsters Located in the Parking Lot South of the Administrative Building



View of AOC 1 – Methyl Ethyl Ketone Release West of Building 2



View of AOC No. 2 – Location of 1980s Fire at Northwestern Corner of Building 2

View of Production Raw Material Storage Area